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Attorneys for Respondent

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

ALLEN T. REED,

Petitioner,

v.

BRANDON KELLY,

Respondent.

Case No. 2:21-cv-01499-HZ

DECLARATION OF NICK M. KALLSTROM
IN SUPPORT OF MOTION FOR
EXTENSION OF TIME

I, Nick M. Kallstrom, declare:

1. I am an attorney licensed to practice law in the State of Oregon and an Assistant Attorney General for the State of Oregon.
2. I am the assigned attorney representing respondent in the above-captioned case.
3. My office has worked to compile the record of the underlying state-court proceedings. However, more time is needed to review that record, research the issues presented, and prepare the response and answer. Obligations in other matters have prevented me from performing those tasks to date.

4. A representative of this office verified that petitioner is a prisoner not represented by counsel in this matter. Pursuant to Local Rule 7-1(a)(1)(C), I did not confer with petitioner, a *pro se* inmate, about this motion.

5. This is respondent's second request for an extension of time.

6. Therefore, respondent respectfully requests a 60-day extension of time, to and including **July 5, 2022**, within which to file the response and answer to petitioner's petition for writ of habeas corpus.

I declare under penalty of perjury that the foregoing is true and correct.

EXECUTED on May 5, 2022.

s/ Nick M. Kallstrom
NICK M. KALLSTROM
Assistant Attorney General

CERTIFICATE OF SERVICE

I certify that on May 5, 2022, I served the foregoing DECLARATION OF NICK M. KALLSTROM IN SUPPORT OF MOTION FOR EXTENSION OF TIME upon the parties hereto by the method indicated below, and addressed to the following:

Allen T. Reed
SID # 10546594
Oregon State Penitentiary
2605 State Street
Salem, Oregon 97310

☐ HAND DELIVERY
☒ MAIL DELIVERY
☐ OVERNIGHT MAIL
☐ TELECOPY (FAX)
☐ E-MAIL

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